

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

Hon. Robert B. Kugler

Civil No. 1:19-md-2875-RBK-JS

DECLARATION OF RAYMOND THOMAS

Pursuant to 28 U.S.C. § 1746, I, Raymond Thomas, hereby declare as follows:

1. I am a Project manager for Consilio LLC (“Consilio”).
2. Consilio has been retained by Mylan to provide eDiscovery and managed review services for this litigation.
3. To date, Consilio and Mylan’s outside counsel have manually reviewed 698,221 electronic documents related to its 13 “priority” custodians.
4. Through the use of TAR analytics, we have determined the 670,739 documents related to the “priority custodians” that remain unreviewed are likely to be non-responsive and constitute a “null set.”
5. In an effort to validate the null set, Consilio spent 425 hours reviewing 15,000 randomly sampled documents which the TAR system deemed likely to be non-responsive, and found only 96 responsive documents during this review, or 0.64%. The cost of this review of 15,000 documents was \$13,885.
6. In order to review the 670,739 “priority” custodian null set documents by the November 29, 2020 production deadline, Mylan would be required to retain 200 reviewers, for between 16,000 and 20,000 attorney hours over 2-3 weeks.
7. Consilio estimates the review of 670,739 “priority” custodian null set documents would cost Mylan \$850,000, which is not inclusive of outside counsel’s anticipated fees.

Dated: November 9, 2020

Respectfully submitted,

/s/ *Raymond Thomas*